

**MEMO** **FILED** **CORSED**

MICHAEL A. CARDOZO
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT

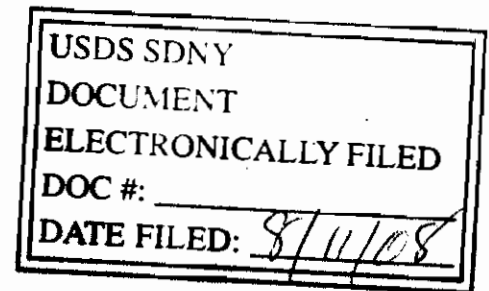
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August 7, 2008

BY FACSIMILE

Honorable P. Kevin Castel
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007-1312



Re: Michael Santangelo v. Warden Bailey, et. al.,
08-CV-4556 (PKC)(JCF)

Dear Judge Castel:

I am the Assistant Corporation Counsel assigned to the above-referenced action. I write to respectfully request that defendants' time to respond to the Complaint be extended to September 8, 2008. The defendant's response is currently due August 8, 2008. This is defendants' second request for an extension of time in this matter. Plaintiff, who is proceeding *pro se*, has consented to this request. 11

Plaintiff brings this lawsuit challenging the conditions of his confinement while incarcerated on Rikers Island. He has named 26 individual defendants in this matter, 14 of whom are only identified as "John Doe," "Jane Doe," or "John/Jane Doe." The additional time is necessary to discover the identities of these named defendants, interview them, and determine issues of representation pursuant to General Municipal Law 50-k(2), as well as to conduct an investigation into plaintiff's allegations. Additionally, all of the individually named defendants have not been served in this matter. An extension of time will increase the likelihood of this office being able to interpose a single response.

Thank you for your consideration of defendants' request for an extension of time in this matter.

Respectfully Submitted,



Michael Suarez
Assistant Corporation Counsel

cc: The Honorable James C. Francis

Michael Santangelo, T/N Michael Bonano, *pro se*
520 Gates Avenue
Brooklyn, New York 11216

8/8/08
Application granted.
SO ORDERED.
James C. Francis IV
USMJ